OUTDOOR POWER EQUIPMENT INSTITUTE

Independent Technical Panel on Demand Management Measures
Public Draft Report
Recommendations Report to the Legislature on Landscape Water Use Efficiency

Comments Provided by Outdoor Power Equipment Institute (OPEI)

OPEI appreciates the opportunity to provide comments to the Independent Technical Panel.

The Outdoor Power Equipment Institute (OPEI) is a major international trade association representing the manufacturers and their suppliers of consumer and commercial outdoor power equipment. Outdoor power equipment products (OPE) include lawnmowers, garden tractors, utility vehicles, trimmers, edgers, chain saws, snow throwers, tillers, leaf blowers and other related products. These products derive their power from many different sources including rechargeable battery, corded electric, small spark-ignition (gasoline) engines, diesel engines, propane, and natural gas.

OPEI contributes to the viability of the industry and the welfare of the public by encouraging a long term view of the political, economic, sociological and technical challenges facing the industry and the impact of these challenges on society.

The U.S. outdoor power equipment industry and its supplier base are estimated to contribute $12 billion to the U.S. Gross Domestic Product. U.S. manufacturers of OPE and their suppliers employ 75,000 people across 45 states, and ship products to nearly 200 countries.

General Comments

Water is a precious resource, and to make every drop count, consumers need to be encouraged to use climate appropriate plants in their landscapes, use water efficient irrigation systems, and be educated on the application of Best Management Practices (BMPs). Specifically, water savings can result without the significant expense of lawn conversions. Unfortunately, many consumers overwater their landscapes. The consumer habit of overwatering will not go away with a change in what is planted. Change will arise from education and the application of Best Management Practices, regardless of the plants being used.

Even during this time of drought and concern about water savings, Californians can keep their lawns, save water, and be good environmental stewards. Additionally, they can still reap the many environmental and human health benefits of living landscapes, including turfgrass. But education is key.

Not enough people know about warm season grass species. Developed in California for the Golden State's distinct climate requirements, these warm season grass varieties are low water users, drought tolerant and

can go dormant in times of high heat and low water availability. Many cool season grasses can also go dormant in times of low water availability. For both types, when water again becomes available, the grasses will recover and green up. A lawn, even when brown, continues to provide important environmental and human health benefits.

The application of water budgeting tools can be very effective at reducing over-watering, and much more cost effective than wholesale lawn conversions. Meters for outdoor watering, smart irrigation, and careful management of homeowner watering can ensure that landscapes are maintained in a way that is sustainable and water-efficient.

Climate appropriate plants should always be considered for new landscape projects. Climate appropriate plants for California include warm season turf grasses, many of which have been developed at the University of California-Riverside specifically for Western climates.

Keeping a living landscape provides home and business owners with a variety of benefits. Lawns, including turfgrass and other plant materials, are functional; providing many benefits, 24 hours a day, 7 days a week. These contributions include:

- Producing oxygen
- Sequestering carbon
- Reducing the heat island effect
- Capturing and filtering storm water, reducing storm water runoff
- Promoting water infiltration, restoring water to the aquifers
- Improving air quality by capturing dust, smoke particles and other pollutants
- Supporting biodiversity and providing a habitat for worms, bugs, pollinators like bees and butterflies, and other wildlife
- Controlling soil erosion

Deadening the landscape, even with the good intention of saving water, sacrifices the many contributions living landscapes provide and results in negative and unintended consequences for many years to come. Water wise climate appropriate plants are available and should be used in California, including appropriate warm season turf grass.

With the serious nature of the drought, its effect on daily life in California, and the impact of water savings efforts on state and local government budgets, we have become aware that there is significant legislative activity around these issues, with multiple bills currently proposed.

With regard to the recommendations put forth in the ITP Report, OPEI submits some specific comments and recommendations:

SECTION 4: VOLUNTARY TURF REPLACEMENT

Section 4, Recommendation 1: Turf Replacement Incentive Program

OPEI supports the establishment of a tax credit for investment in water saving measures. This should allow for the installation of low water use, drought tolerant plant materials, rather than the blind removal of turf. In most cases, the application of Best Management Practices and the use of smart irrigation control systems will save more water at a lower relative cost than turf replacement.

There are numerous low water use, drought-tolerant species of turfgrass available to Californians and developed specifically for California climates. These should be recognized as appropriate plant materials within this report and recommendations.

This recommendation should also allow for tax credits for improvements in irrigation systems.

Installation of hardscapes should be excluded. Although hardscape may reduce water usage, it creates negative human health and environmental consequences by deadening the landscape and increasing the heat island effect. Hardscapes create a surface where water "sheets off." Instead of absorbing water, hardscapes encourage storm water runoff. As that water flows away it carries debris, dirt and pet waste with it, concentrating harmful pollutants.

Water districts have limited funds to provide incentives and rebates for the most efficient appliances, irrigation systems and water-practices. Consequently, to achieve state-wide mandates to dramatically reduce water consumption, districts must wisely prioritize investments of public funds to these incentives that efficiently provide the greatest reductions with proven-certainty.

To support this approach, we recommend ITP members refer to the Los Angeles City Controller's independent review in November 2015 of the Los Angeles Department of Water and Power's (DWP) customer-based water control programs.

http://projects.scpr.org/documents/#document=2519638-lacityp-031982

Auditors found that the turf replacement program gave DWP the lowest return on investment in terms of gallons of water saved per dollar spent, compared with other conservation programs. Audits concluded that all of DWP's incentive programs reduced *per capita* water use by only 2.6 gallons per day over two years (compared to 22 gallons per day from voluntary measures). Even though turfgrass replacement reflects most of the invested funds, it only resulted in per capita water savings of about half a gallon per day.

According to the Audit, the turfgrass replacement program also resulted in unintended adverse environmental consequences, including an "increase in surface temperatures" and "killing trees dependent on residual water from lawns."

Furthermore, we suggest the ITP members refer to "Turf Removal and Replacement: Lessons Learned" by the California Urban Water Conservation Council.
http://cuwcc.org/Portals/0/Document%20Library/Resources/Publications/Council%20Reports/Turf%20Removal%20_%20Replacement%20-%20Lessons%20Learned.pdf)

The authors note in the appendix that turf removal rebate programs are the most expensive option for water conservation programs, ranking well behind many other types of conservation rebate programs. As a water source, desalination, with a range of $900-$2,500 annual cost per acre foot, is on par with turfgrass removal at about $1,700 per acre foot, on average.

SECTION 5: IMPROVEMENTS IN EXISTING LANDSCAPES

Section 5, Recommendation 1: Require Irrigation System Evaluations as Part of Home Inspections for Single-Family Residential Properties

OPEI supports this recommendation.

Section 5, recommendation 2: Landscapes over One Acre

OPEI supports this recommendation.

Section 5, Recommendation 3: State Owned Facilities

Recommending a retro-fit from a traditional landscape to a sustainable landscape is not defined and can lead to unintended negative results. We suggest the focus of this recommendation center on applying an appropriate water budget approach to the landscape, require the application of MWELO (Model Water Efficient Landscape Ordinance) guidance, and require the use of site appropriate low water use plantings (WUCOLS - Water Use Classification of Landscape Species). A traditional looking landscape can be sustainable using the right plants for the site and Best Management Practices.

We suggest that this recommendation should include a requirement to install separate water metering for irrigation systems.

SECTION 6: STATE MODEL WATER EFFICIENT LANDSCAPE ORDINANCE (MWELO) FUTURE REVISIONS & PROCESS UPDATES

Section 6, Recommendation 1: MWELO Future Revisions for the Next Review Cycle

OPEI generally supports this recommendation, but we have some comments regarding Table 1 items:

Applicability – The reduction to 500 square feet for existing landscapes will require inordinate expense for an extremely small area with questionable benefit. This should remain at a 2500 square feet threshold. We agree that this requirement is appropriate to apply to new landscapes beginning at 500 square feet.

Turfgrass slope – The reduction from 25 degrees to 10 degrees slope may actually result in more runoff from these areas. Turfgrass is known to reduce the speed of storm water runoff, capture and spread the water and facilitate infiltration. Irrigation systems can be readily designed to prevent runoff on slopes up to 25 degrees. This can include drip irrigation systems where needed to replace spray irrigation. We recommend that this should remain at 25 degrees.

In the justification there is a comment as to “non-functional turf”. As noted in an earlier comment, turfgrass is functional all of the time. These benefits should not be overlooked.

Section 6, Recommendation 2: MWELO Revision: Aligning with the CALGreen Title 24 Revision Process to Maximize Enforcement

OPEI supports this recommendation.

Section 6, Recommendation 3: State Facility Leadership for New Landscape

OPEI supports this recommendation. We believe education, training, certification and communication are extremely important.

SECTION 7: COMPLEMENTARY POLICIES AND REGULATIONS

Section 7, Recommendation 1A: Product Standards for Irrigation Equipment – Controllers

OPEI supports this recommendation.

Section 7, Recommendation 1B: Product Standards for Irrigation Equipment – Sprinkler Bodies

OPEI supports this recommendation.

Section 7, Recommendation 2: Permit Required for Irrigation Installation

OPEI supports this recommendation.

Section 7, Recommendation 4: Piloting Connection Charges that Promote Landscape Efficiency

OPEI suggests the reduced connection charges should apply to all water saving strategies.

OPEI also suggests that in support of this recommendation, there should be a requirement for a separate meter for outdoor water use, including landscape, swimming pools and water features.

Section 7, Recommendation 5: Plant Labeling

OPEI supports this recommendation.

Section 7, recommendation 7: Upgrades to the California Irrigation Management Information System (CIMIS)

OPEI supports this recommendation.

SECTION 8: WORKFORCE TO ACCOMPLISH THE TRANSFORMATION

Section 8, Recommendation 1: Certification of Professionals

OPEI supports this recommendation.

Section 8, Recommendation 2: C-27 Examination Questions Covering Water Use Efficiency and Sustainable Practices

OPEI supports this recommendation.

SECTION 9: PUBLIC PERCEPTION AND NORMS

Section 9, recommendation 1: Defining Professionals: Recognition of Examples of Low Water Use Landscapes and a Sustainable Statewide Approach to Outreach and Information

OPEI supports this recommendation.

SECTION 10: RESEARCH NEEDS AND SUPPORT

Section 10, Recommendation 1: [Title Pending]

OPEI supports this recommendation.

Section 10, recommendation 2: Water Use Classification of Landscape Species IV (WUCOLS IV) Support

OPEI supports this recommendation.

Thank you for the opportunity to provide these comments and recommendations.

Sincerely,

Gerry Coons

Gerry Coons
VP Standards and Industry Affairs
Outdoor Power Equipment Institute - OPEI